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Attorneys for Plaintiff The Frank Lloyd Wright Foundation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE FRANK LLOYD WRIGHT
FOUNDATION, an Arizona not-for-
profit corporation,

Plaintiff,

vs.

HAMPTON COURT JEWELERS
LTD. d/b/a CELLINI FINE JEWELRY,
a New York domestic business
corporation,

Defendant.

Civil Action No. 08-CV-00422 (NRB)

ECF Case

REQUEST FOR ADJOURNMENT

Plaintiff, The Frank Lloyd Wright Foundation ("Plaintiff") hereby requests that the Court adjourn the initial pretrial conference currently scheduled for Wednesday, April

23, 2008 at 4:30 p.m. Such adjournment is requested because defendant Hampton Court Jewelers Ltd. d/b/a Cellini Fine Jewelry (“Defendant”) has filed a third-party complaint against third-party defendant Bagués Masriera, S.A. (“Third-Party Defendant”), and to date, service has not been effected on Third-Party Defendant.¹ Conducting a pretrial conference without the participation of Third-Party Defendant would be premature because of the integral role that Third-Party Defendant is likely to play in this litigation.

Undersigned counsel has consulted with counsel for Defendant, who has consented to this adjournment. Undersigned counsel and counsel for Defendant agree that the participation of Third-Party Defendant in the initial pretrial conference is necessary for the expeditious handling of this case. Therefore, the parties recommend and request that the Court adjourn the pretrial conference at least until Third-Party Defendant has been served with process and has filed an answer or otherwise appeared in this case.

For the Court’s convenience and pursuant to the Court’s Notice of March 26, 2008, counsel for Plaintiff and for Defendant have conferred and are available on the following dates in the near future:

- May 2008: 12, 13, and 16
- June 2008: 2, 4-6, 9-11, 16-17, 23-26, and 30.

It is anticipated that, prior to the initial pretrial conference, the parties will meet and confer pursuant to Rule 26(f) and will exchange initial disclosure statements pursuant to Rule 26(a)(1). Therefore, this case will not be delayed by an adjournment of the initial pretrial conference until all parties can participate.

¹ The law firm of Fross Zelnick Lehrman & Zissu, P.C., which represents Third-Party Defendant, has been in communication with counsel for both Plaintiff and Defendant, but to date has not received permission from its client to accept service of process. As a result, Defendant is proceeding through other channels.

Dated: New York, New York
April 17, 2008

By: /s/ Michael G. Goldberg
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Certificate of Service

The undersigned hereby certifies that on April 17, 2008, a copy of the foregoing was electronically transmitted to the Clerk's Office of the United States District Court for the Southern District of New York and to the following counsel of record by electronic mail:

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